

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

RALPH STRANO, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

KIPLINGER WASHINGTON EDITORS,
INC.,

Defendant.

Case No. 21-cv-12987-TLL-PTM

Hon. Thomas L. Ludington

**SUPPLEMENTAL DECLARATION OF RYAN BAHRY REGARDING
REVISED CAFA NOTICE**

I, RYAN BAHRY, declare and state as follows:

1. I am a Director at JND Legal Administration (“JND”). JND is a legal administration service provider with its headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases.

2. JND is serving as the Settlement Administrator¹ in the above-captioned litigation (“Action”), for the purposes of administering the Class Action Settlement Agreement (“Settlement Agreement”), preliminarily approved by the Court in its Opinion and Order (1) Granting Plaintiffs’ Motion for Preliminary Approval of Settlement, (2) Certifying Settlement Class, (3) Appointing Class Representative, (4) Appointing Class Counsel, (5) Approving Notice Plan, (6) Appointing Claims Administrator, (7) Directing Publication of Notice, and (8) Setting Scheduling Order, dated January 6, 2023 (“Order”).

¹ Capitalized terms used and not otherwise defined herein shall have the meanings given such terms in the Class Action Settlement Agreement (“Settlement Agreement”).

3. This Supplemental Declaration is meant to supplement my previous declaration dated May 19, 2023 (the “Declaration”). This Supplemental Declaration is based on my personal knowledge and information provided to me by experienced JND employees and, if called on to do so, I could and would testify competently thereto.

REVISED CAFA NOTICE

4. As detailed in the Declaration, JND mailed a CD-ROM to comply with the Class Action Fairness Act (“CAFA”) 28 U.S.C. § 1715 on July 18, 2022. On June 6, 2023, the Court ordered JND to disseminate revised CAFA notice to the appropriate government officials (in its “Order Adjourning Final Approval Hearing and Directing Notice”). In order to comply with the Court, JND compiled a CD-ROM with the following documents in accordance with CAFA:

- a. Class Action Complaint, filed December 22, 2021;
- b. First Amended Class Action Complaint, filed February 18, 2022;
- c. Plaintiff’s Unopposed Motion for Preliminary Approval of Class Action Settlement, filed July 8, 2022;
- d. Class Action Settlement Agreement, filed July 8, 2022;
- e. E-mail Notice, filed July 8, 2022;
- f. Postcard Notice, filed July 8, 2022;
- g. Long Form Notice, filed July 8, 2022;
- h. Claim Form for Unidentified Class Members, filed on July 8, 2022;
- i. Opinion and Order Denying Without Prejudice Plaintiff’s Motion for Preliminary Approval of Settlement, entered December 15, 2022;
- j. Plaintiff’s Revised Unopposed Motion for Preliminary Approval of Class Action Settlement, filed December 21, 2022;

- k. Opinion and Order (1) Granting Plaintiffs' Motion for Preliminary Approval of Settlement, (2) Certifying Settlement Class, (3) Appointing Class Representative, (4) Appointing Class Counsel, (5) Approving Notice Plan, (6) Appointing Claims Administrator, (7) Directing Publication of Notice, and (8) Setting Scheduling Order, entered on January 6, 2023;
- l. Plaintiff's Unopposed Motion for Attorneys' Fees, Costs, Expenses, and Service Award, filed on April 10, 2023;
- m. Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement, filed on May 22, 2023;
- n. Order Adjourning Final Approval Hearing and Directing Notice, entered on June 6, 2023;
- o. List of Class Members by State; and
- p. Proportionate Share of Class Members by State.

5. The supplemental CD-ROM was mailed on June 9, 2023, to the appropriate Federal and State officials identified in the attachment with an accompanying cover letter, a copy of which is attached hereto as **Exhibit A**.

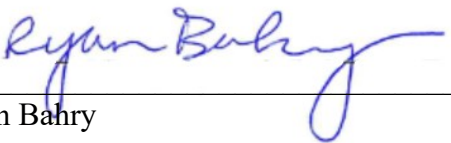
SETTLEMENT WEBSITE

6. As detailed in the Declaration, JND established a Settlement Website (www.KiplingerSettlement.com) for this matter. On June 6, 2023, the Court ordered JND to update the Settlement Website to reflect the new date and time of the Final Approval Hearing (in its "Order Adjourning Final Approval Hearing and Directing Notice"). JND promptly updated the date and time of the Final Approval Hearing in all applicable areas on the Settlement Website on

June 6, 2023. JND will continue to update and maintain the Settlement Website throughout the administration process.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed September 11, 2023 in Seattle, Washington



Ryan Bahry

EXHIBIT A



June 9, 2023

United States Attorney General
and the Appropriate Officials
Identified in Attachment A

RE: CAFA Notice of Proposed Class Action Settlement

Dear Sir or Madam:

This Notice is being provided to you in accordance with the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715 on behalf of Kiplinger Washington Editors, Inc., the defendant in the below-referenced class action ("the Action"). Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement was filed with the Court on July 8, 2022, and preliminary approval was granted on January 6, 2023. The Court has scheduled a final approval hearing on October 5, 2023.

Case Name:	<i>Strano v. Kiplinger Washington Editors, Inc.</i>
Case Number:	21-cv-12987-TLL-PTM
Jurisdiction:	United States District Court, Eastern District of Michigan
Date Settlement filed with Court:	July 8, 2022

Copies of all materials filed in the above-named actions are electronically available on the Court's Pacer website found at <https://pcl.uscourts.gov>. Additionally, in compliance with 28 U.S.C. § 1715(b), the enclosed CD-ROM contains the following documents filed in the Action:

01 - Complaint.pdf

Class Action Complaint, filed December 22, 2021

02 - Amended Complaint.pdf

First Amended Class Action Complaint, filed February 18, 2022

03 - Motion for Preliminary Approval.pdf

Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement, filed July 8, 2022

04 - Settlement Agreement.pdf

Class Action Settlement Agreement, filed on July 8, 2022

05 - Email Notice.pdf

Email Notice, filed on July 8, 2022

06 - Postcard Notice.pdf

Postcard Notice, filed on July 8, 2022

07 - Long Form Notice.pdf

Long Form Notice, filed on July 8, 2022

08 – Claim Form.pdf

Claim Form for Unidentified Class Members, filed on July 8, 2022

09 – Order Denying Preliminary Approval.pdf

Opinion and Order Denying Without Prejudice Plaintiff's Motion for Preliminary Approval of Settlement, entered December 15, 2022

10 – Revised Motion for Preliminary Approval.pdf

Plaintiff's Revised Unopposed Motion for Preliminary Approval of Class Action Settlement, filed December 21, 2022

11 – Preliminary Approval Order.pdf

Opinion and Order (1) Granting Plaintiffs' Motion for Preliminary Approval of Settlement, (2) Certifying Settlement Class, (3) Appointing Class Representative, (4) Appointing Class Counsel, (5) Approving Notice Plan, (6) Appointing Claims Administrator, (7) Directing Publication of Notice, and (8) Setting Scheduling Order, entered on January 6, 2023

12 – Fee Motion.pdf

Plaintiff's Unopposed Motion for Attorneys' Fees, Costs, Expenses, and Service Award, filed on April 10, 2023

13 – Final Approval Motion.pdf

Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement, filed on May 22, 2023

14 – Order Adjourning Hearing.pdf

Order Adjourning Final Approval Hearing and Directing Notice, entered on June 6, 2023

15 – List of Class Members by State.pdf

16 – Proportionate Share of Class Members by State.pdf

There are no other settlements or agreements made between Counsel for the parties related to the class defined in the proposed settlement, and as of the date of this Notice, no Final Judgment or notice of dismissal has been entered in this case.

If you have any questions regarding the details of the case and settlement, please contact Defense Counsel's representatives at:

Walter E. Diercks
Rubin, Winston, Diercks, Harris & Cooke, LLP
1250 Connecticut Ave., NW, Suite 700
Washington, DC 20036
Phone: (202) 861-0870
Email: wdiercks@rwdhc.com

For questions regarding this Notice, please contact JND at:

JND Class Action Administration
1100 2nd Ave, Suite 300
Seattle, WA 98101
Phone: 800-207-7160

Regards,

JND Legal Administration

Encl.

CAFA Notice - Attachment A - Service List

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CAFA Notice - Attachment A - Service List

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CAFA Notice – Attachment A – Service List

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CAFA Notice – Attachment A – Service List

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CAFA Notice - Attachment A - Service List

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